

FILED

OCT 20 2021 *JK*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EDMOND HARRIS and
JOSHUA WALKER

No. 21 CR 392

Violations: Title 18, United States Code,
Sections 371, 2119, 924(c)(1)(A),
924(j)(1), and 2

SUPERSEDING INDICTMENT

UNDER SEAL

1:21-cr-392
Judge Rowland
Magistrate Judge Kim

COUNT ONE

The SPECIAL APRIL 2021 GRAND JURY charges:

1. Beginning on or about January 19, 2021, and continuing until on or about January 20, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

EDMOND HARRIS and
JOSHUA WALKER,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to take a motor vehicle from the presence of another person by force and violence and by intimidation, with intent to cause death and serious bodily harm, which vehicle had been transported, shipped, and received in interstate commerce, in violation of Title 18, United States Code, Section 2119.

2. It was part of the conspiracy that defendants EDMOND HARRIS and JOSHUA WALKER, and others known and unknown to the Grand Jury, agreed to

use stolen vehicles and a firearm in order to take a motor vehicle from the presence of another person by force and violence and by intimidation.

3. It was further part of the conspiracy that defendants EDMOND HARRIS and JOSHUA WALKER, and others known and unknown to the Grand Jury, obtained stolen vehicles, including a Dodge Journey with vehicle identification number 3C4PDCAB1DT733316, in order to use those vehicles to carjack victims and obtain additional motor vehicles.

4. It was further part of the conspiracy that defendants EDMOND HARRIS and JOSHUA WALKER, and others known and unknown to the Grand Jury, obtained, possessed, and brandished a firearm in connection with the taking of a motor vehicle.

5. It was further part of the conspiracy that defendants EDMOND HARRIS and JOSHUA WALKER, and others known and unknown to the Grand Jury, did conceal and hide, and cause to be concealed and hidden, the purposes of acts done in furtherance of the conspiracy.

OVERT ACTS

6. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendants committed one or more overt acts in the Northern District of Illinois, and elsewhere, which overt acts included but were not limited to the following:

- (a) On or before January 19, 2021, defendant EDMOND HARRIS obtained a firearm;

- (b) On or about January 19, 2021, defendant EDMOND HARRIS and others known and unknown to the Grand Jury obtained a stolen black Dodge Journey with vehicle identification number 3C4PDCAB1DT733316;
- (c) On or about January 20, 2021, in Chicago, defendant EDMOND HARRIS drove the stolen Dodge Journey in front of Victim A's 2011 Mitsubishi Outlander SUV with vehicle identification number JA4AP4AU0BZ024591;
- (d) On or about January 20, 2021, in Chicago, JOSHUA WALKER brandished a firearm at Victim A;
- (e) On or about January 20, 2021, in Chicago, defendants EDMOND HARRIS and JOSHUA WALKER, took Victim A's vehicle from the person and presence of Victim A by force, violence, and intimidation;
- (f) On or about January 20, 2021, in Chicago, defendant JOSHUA WALKER drove Victim A's vehicle to JOSHUA WALKER's residence in Chicago, Illinois;

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 20, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS and
JOSHUA WALKER,

defendants herein, with intent to cause death and serious bodily harm, did take and attempt to take a motor vehicle, namely a 2011 Mitsubishi Outlander SUV with vehicle identification number JA4AP4AU0BZ024591, that had been transported, shipped, and received in interstate commerce from the person and presence of Victim A by force, violence, and intimidation;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT THREE

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 20, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS and
JOSHUA WALKER,

defendants herein, did use, carry, and brandish a firearm, during and in relation to
a crime of violence for which they may be prosecuted in a court of the United States,
namely carjacking, in violation of Title 18, United States Code, Section 2119, as
charged in Count Two of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 20, 2021, at Oak Park, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS,

defendant herein, with intent to cause death and serious bodily harm, did attempt to take a motor vehicle, namely a 2019 Nissan Altima with vehicle identification number 1N4BL4CV7KC223772, that had been transported, shipped, and received in interstate commerce from the person and presence of Victim B by force, violence, and intimidation, resulting in serious bodily injury to Victim B;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT FIVE

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 20, 2021, at Oak Park, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS,

defendant herein, did use, carry, brandish, and discharge a firearm, during and in
relation to a crime of violence for which he may be prosecuted in a court of the United
States, namely carjacking, in violation of Title 18, United States Code, Section 2119,
as charged in Count Four of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SIX

The SPECIAL APRIL 2021 GRAND JURY charges:

On or about March 23, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS,

defendant herein, with intent to cause death and serious bodily harm, did take and attempt to take a motor vehicle, namely a 2013 Lexus GS sedan with vehicle identification number JTHCE1BL5D5013085, that had been transported, shipped, and received in interstate commerce from the person and presence of Javier Ramos by force, violence, and intimidation, resulting in the death of Javier Ramos;

In violation of Title 18, United States Code, Section 2119.

COUNT SEVEN

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about March 23, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS,

defendant herein, did use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Six of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT EIGHT

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about January 20, 2021, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDMOND HARRIS,

defendant herein, in the course of a violation of Title 18, United States Code, Section 924(c), as charged in Count Seven of this Superseding Indictment, did use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Six of this Superseding Indictment, causing the death of Javier Ramos through the use of the firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a), in that defendant, with malice aforethought, killed Javier Ramos during the perpetration and attempted perpetration of a robbery.

In violation of Title 18, United States Code, Section 924(j)(1).

FORFEITURE ALLEGATION

The SPECIAL APRIL 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 924(c) and 2119, as set forth in this Superseding Indictment, defendants shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Sig Sauer, P226, 9mm pistol bearing serial number U300206, and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY